

UNITED STATES OF AMERICA
Before the
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE SECRETARY

Experimental "Ride-Along")
Classification Change for Periodicals)

Docket No. MC2000-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS: HOWARD SCHWARTZ (OCA/USPS-T2-1-6)
(October 18, 1999)

Pursuant to sections 25 and 26 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents. Instructions included with OCA interrogatories OCA/USPS-T1-1-8 to witness Altaf H. Taufique, dated October 18, 1999, are hereby incorporated by reference.

Respectfully submitted,



TED P. GERARDEN
Director
Office of the Consumer Advocate

EMMETT RAND COSTICH
Attorney

OCA/USPS-T2-1. Please refer to the testimony at page 1, lines 1-2.

- a. Please identify all other "proponents of the 'Ride-Along' classification change" of whom you are aware.
- b. Please identify any opponents of "the 'Ride-Along' classification change" of whom you are aware.
- c. Please identify all bases of opposition to "the 'Ride-Along' classification change" of which you are aware.

OCA/USPS-T2-2. Please refer to the testimony at page 1, lines 1-2, and at page 4, lines 9-14.

- a. Of the proponents of "the 'Ride-Along' classification change" of whom you are aware, how many were included in the "informal survey of [MPA's] Postal Committee members"?
- b. Of the proponents of "the 'Ride-Along' classification change" of whom you are aware, how many responded to the "informal survey of [MPA's] Postal Committee members"?
- c. Of the proponents of "the 'Ride-Along' classification change" of whom you are aware, how many are not members of MPA's Postal Committee?

OCA/USPS-T2-3. Please refer to the testimony at page 4, lines 9-14.

- a. How many members are there on MPA's Postal Committee?
- b. Please provide the total FY98 Periodicals mail volume of the Postal Committee members.

- c. Please explain how the "informal survey" of Postal Committee members was conducted, and identify and describe the information collected by the informal survey.
- d. How many of the Postal Committee members participated in the informal survey?
- e. Please provide the total FY98 Periodicals mail volume of the Postal Committee members who took part in the informal survey.

OCA/USPS-T2-4. Please refer to the testimony at page 4, lines 9-14. Please state the time period (e.g., calendar year 1998, fiscal year 1999, etc.) for the figures 91,336,000 and 14,189,000.

OCA/USPS-T2-5. Please refer to the testimony at page 4, lines 9-14.

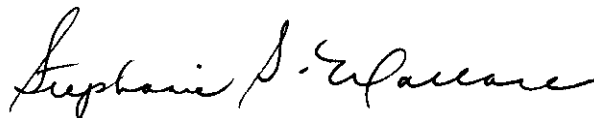
- a. How many members of the Magazine Publishers of America (MPA) report their postage payments through the Centralized Postage Payment (CPP) System?
- b. How many members of the Postal Committee report their postage payments through the Centralized Postage Payment (CPP) System?
- c. How many members of the Postal Committee that report their postage payments through the Centralized Postage Payment (CPP) System participated in the informal survey?
- d. Please explain the discrepancy between the "present volume for Standard A pieces mailed in combination with periodicals of 14,189,000," and the 12,631,993 Standard (A) pieces with Periodicals reported by the Postal Service from the CPP. See USPS-T-1, Exhibit 1.

OCA/USPS-T2-6. Please refer to the testimony at page 3, lines 7-12, and page 4 (as revised on 10/06/99), lines 1-8.

- a. Please show the derivation of the 13 million pieces.
- b. Please identify the origin of the 13 million pieces in terms of current and expected new (or future) advertising pieces.
- c. Please confirm that you are assuming an elasticity of demand of -6.045685 $\left(\frac{((13.356-3.339)/3.339)}{((0.10-0.1985)/0.1985)}\right)$. If you do not confirm, please explain.
- d. Is your testimony concerning the "projection of approximately 91,336,000" Ride-Along pieces based upon an elasticity of demand of -6.045685? Please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with section 12 of the rules of practice.



STEPHANIE S. WALLACE

Washington, D.C. 20268-0001
October 18, 1999